Case 2:13-cv-00108-JS-AKT Document 9 Filed 01/28/13 Page 1 of 2 PageID #: 48 Representing Management Exclusively in Workplace Law and Related Litigation



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January 28, 2013

VIA ECF

Hon. A. Kathleen Tomlinson U.S. Magistrate Judge Eastern District of New York 100 Federal Plaza P.O. Box 9014 Central Islip, NY 11722

Re: Ursula Izurieta, et al. v. Maxi-Aids, Inc., et al.

Case No.CV-13-0108

Dear Magistrate Judge Tomlinson:

As counsel for Defendants, Maxi-Aids, Inc. and Elliot Zaretsky, we are writing pursuant to Rule 1(D) of Your Honor's individual practice rules and Rule 1(E) of Judge Seybert's individual practice rules to request an extension of time to answer, move or otherwise respond to Plaintiffs' Complaint up to and including March 1, 2013. The extension is necessary so that counsel for Defendants can complete their preliminary investigation of Plaintiffs' allegations. As demonstrated by the attached Stipulation, Plaintiffs' counsel does not object to this request. No prior request for an extension has been made.

Thank you for your courtesy and cooperation in this regard.

Respectfully,

SON LEWIS LÌ

Ana C. Shields

ACS/pdm Enclosure

Counsel for Plaintiffs, via ECF cc:

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK	v
URSULA IZURIETA and KARIN DANZA, on behalf of themselves and all other similarly situated individuals,	: Civil Action No. 13-CV-0108(JS)(AKT)
Plaintiffs,	: :
v.	:
MAXI-AIDS, INC. and ELLIOT ZARETSKY, in his individual and professional capacities,	STIPULATION TO EXTEND TIME TO ANSWER
Defendants.	· : :

IT IS HEREBY STIPULATED BY AND BETWEEN Thompson Wigdor LLP, attorneys for Plaintiffs, and Jackson Lewis LLP, attorneys for Defendants, respectively, that:

- 1. Defendants' time to answer the Complaint in this action be and hereby is extended on consent of all parties up to and including March 1, 2013; and
- Defendants will not oppose any future applications by Plaintiffs to amend the 2. Complaint to add causes of action under Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., on behalf of Plaintiffs Ursula Izurieta and Karin Danza.

Melville, New York

Dated: January_, 2013

New York, New York

Dated: January 25, 2013

JACKSON LEWIS LLP

THOMPSON WIGDOR LLP

Atterney for Defendants

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